

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION)	Civil Action No. 04-CV-11136-GAO
Plaintiff,)	
v.)	Judge George O'Toole
)	
DIRECT MARKETING CONCEPTS, INC.,)	
dba TODAY'S HEALTH and DIRECT)	
FULFILLMENT, ITV DIRECT INC., dba)	
DIRECT FULFILLMENT, DONALD W.)	
BARRETT, HEALTHY SOLUTIONS LLC)	
dba DIRECT BUSINESS CONCEPTS,)	
HEALTH SOLUTIONS INC.,)	
ALEJANDRO GUERRERO, MICHAEL)	
HOWELL, GREG GEREMESZ, TRIAD ML)	
MARKETING, INC., KING MEDIA, INC.,)	
and ALLEN STERN,)	
Defendants.)	
)	
)	
HEALTHY SOLUTIONS, LLC dba DIRECT)	
BUSINESS CONCEPTS, a California limited)	
liability company;)	
Cross Claimant,)	
v.)	
ITV DIRECT, INC., a Massachusetts corporation;)	
DIRECT FULFILLMENT LLC, a Massachusetts)	
limited liability company, and DOES 1-10,)	
inclusive,)	
Cross Defendant.)	
)	

**DEFENDANT'S NOTICE OF NON-
OPPOSITION TO PLAINTIFF'S MOTION
FOR LEAVE TO NAME ADDITIONAL
DEFENDANTS AND TO FILE FIRST
AMENDED COMPLAINT**

The following defendants, Healthy Solutions, LLC d/b/a Direct Business Concepts, Health Solutions, Inc., Alejandro Guerrero, a/k/a Alex Guerrero, Michael Howell, and Greg Geremesz do not object to Plaintiff's Motion for Leave to Name Additional Defendants and to File First Amended Complaint filed on November 18, 2004.

Respectfully submitted,
HEALTHY SOLUTIONS, LLC,
HEALTH SOLUTIONS, INC.,
ALEJANDRO GUERRERO,
MICHAEL HOWELL,
GREG GEREMEZ
By its and their attorneys,

Dated: December 7, 2004

/Becky V. Christensen, Esq.
Becky V. Christensen, Esq. CA State Bar # 147013
Craig McLaughlin, Esq. CA State Bar #182876
384 Forest Avenue, Suite 16
Laguna Beach, CA 92651
(949) 376-6100

Dustin F. Hecker, Esq.
POSTERNAK BLANKSTEIN & LUND LLP
Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199-8004
(617) 973-6100

CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2004, a copy of foregoing **NOTICE OF NON-OPPOSITION PLAINTIFF'S MOTION FOR LEAVE TO NAME ADDITIONAL DEFENDANTS AND TO FILE FIRST AMENDED COMPLAINT** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Daniel Kaufman
Kial S. Young
Edward Glennon
FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue, NW,
NJ-3212
Washington, DC 20580
(202) 326-2675, -3525, -3126 (voice)
(202) 326-3259 (fax)
dkaufman@ftc.gov, kyoung@ftc.gov or
eglennon@ftc.gov

ATTORNEYS FOR PLAINTIFF

Peter Brooks, Esq.
SEYFARTH SHAW, LLP
WORLD TRADE CENTER EAST
TWO SEAPORT LAND
SUITE 300
BOSTON, MA 02210
Facsimile: (617) 946-4801
pbrooks@seyfarth.com

ATTORNEYS FOR DIRECT MARKETING CONCEPTS, INC., ITV DIRECT, INC., and DONALD BARRETT

/Becky V. Christensen, Esq.

Becky V. Christensen, Esq. CA State Bar # 147013
Craig McLaughlin, Esq. CA State Bar #182876
O'CONNOR CHRISTENSEN & McLAUGHLIN LLP
384 Forest Avenue, Suite 16
Laguna Beach, CA 92651
(949) 376-6100

Dustin F. Hecker, Esq.
POSTERNAK BLANKSTEIN & LUND LLP
Prudential Tower
800 Boylston Street
Boston, Massachusetts 02199-8004
(617) 973-6100